

### Remarks

Claims 1-3, 5-8, 10-14, and 16-19 are pending in the present application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration and allowance are requested in view of the following remarks.

Claims 1-3, 5-8, 10-14, and 16-19 are rejected under 35 U.S.C. 103(a) over Kenyon et al. (US 6,604,113), hereafter "Kenyon," in view of Tsuda et al. (US 6,629,090), hereafter "Tsuda." This rejection is defective because the cited references, taken alone or in any combination, fail to teach or suggest each and every feature of the claims as required by 35 U.S.C. 103(a).

Applicants would like to thank the Examiner for the courtesy extended to Applicants' undersigned representative during a telephone interview conducted on March 8, 2007. During this discussion, Applicants' representative and the Examiner discussed the Examiner's interpretation of Tsuda as set forth in the "Response to Arguments" section of the above-referenced Final Office Action. No agreement was reached as a result of the interview. The substance of the interview is included in the following remarks.

Regarding independent claim 1 (and similarly independent claims 10 and 16), the references of Kenyon and Tsuda, taken alone or in combination, fail to

disclose, among other features, the display of a **Focus+Context** information visualization model having a plurality of nodes, wherein at least one node in the information visualization model is configured to perform a calculation based on values displayed by other nodes in the information visualization model, **wherein a first mathematical operation is performed when a node is in focus, and wherein a second, different mathematical operation is performed when the same node is not in focus.** That is, the same node will perform a different mathematical operation (and display a result of the different mathematical operation), depending on whether or not that node is in focus in the Focus+Context information visualization model. For example, referring to FIGS. 6 and 8, the “Asia Pacific” Geography node 140 performs an averaging operation when not in focus (FIG. 6), but performs a sum operation when selected and in focus (FIG. 8).

The Examiner admits that Kenyon fails to disclose these features. In order to overcome this glaring deficiency of Kenyon, the Examiner relies on the teachings of Tsuda. However, Tsuda fails to disclose that a node can perform a different mathematical operation (and display a result of the different mathematical operation), depending on whether or not that node is in focus.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims from which the claims depend. Furthermore, Applicants submit that all dependent claims are allowable based on their own distinct features. Since the cited art does not teach

each and every feature of the claimed invention, Applicants respectfully request withdrawal of the rejections.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Examiner's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. These features have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

Accordingly, since the cited references, taken alone or in any combination, fail to teach or suggest each and every feature of the claims as required by 35 U.S.C. 103(a), Applicants respectfully submit that claims 1-3, 5-8, 10-14, and 16-19 are allowable.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

/ John A. Merecki /

John A. Merecki  
Reg. No. 35,812

Dated: March 8, 2007

Hoffman, Warnick & D'Alessandro LLC  
75 State Street, 14<sup>th</sup> Floor  
Albany, NY 12207  
(518) 449-0044 - Telephone  
(518) 449-0047 - Facsimile